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District of Nevada

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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ANITRA LUSSON,

Plaintiff,

v.

ANDREW SAUL,
Commissioner of Social Security,

Defendant.

Case No.: 2:20-cv-01215-DJA

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

Defendant Andrew Saul, Commissioner of Social Security (Defendant) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal and/or Remand (Dkt. No. 16, filed on November 5, 2020), currently due on December 7, 2020, by 30 days, through and including January 6, 2021. Defendant further requests that all subsequent deadlines set forth in the Court's scheduling order (Dkt. No. 15) be extended accordingly.

This is Defendant's first request for an extension of time. Good cause exists for this extension due to Defendant's counsel's workload as described below. Since Plaintiff's motion was filed on November 5, 2020, Defendant's counsel has worked on over 20 district court cases and a Ninth Circuit appeal. Counsel is also responsible for other substantive non-litigation matters in the Office of

1 General Counsel. The Office of General Counsel also currently has a number of attorneys out on
2 leave of absence, in addition to staff attrition, which has increased the undersigned's workload.

3 Additional time is required to review the record, to evaluate the numerous issues raised in
4 Plaintiff's motion, to determine whether options exist for settlement, and if not, to prepare Defendant's
5 response to Plaintiff's motion. Defendant's counsel will endeavor to complete these tasks as soon as
6 possible. This request is made in good faith and with no intention to unduly delay the proceedings,
7 and counsel apologizes for any inconvenience.

8 On November 30, 2020, counsel for Defendant conferred with Plaintiff's counsel, who has no
9 opposition to this motion.

10 It is therefore respectfully requested that Defendant be granted an extension of time to respond
11 to Plaintiff's Motion for Reversal and Remand, through and including January 6, 2021.

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13 Dated: December 1, 2020

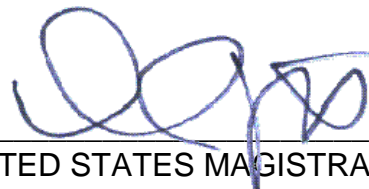
Respectfully submitted,

14 NICHOLAS A. TRUTANICH
15 United States Attorney

16 /s/ Allison J. Cheung
17 ALLISON J. CHEUNG
Special Assistant United States Attorney

18 **IT IS SO ORDERED.**

19 DATED: December 2, 2020.

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23 UNITED STATES MAGISTRATE JUDGE
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CERTIFICATE OF SERVICE

I, Allison J. Cheung, certify that the following individual(s) were served with a copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME (*FIRST REQUEST*)** on the date, and via the method of service, identified below:

CM/ECF:

Marc Kalagian
marc.kalagian@rksslaw.com
Attorney for Plaintiff

Gerald Welt
gmwesq@weltlaw.com
Attorney for Plaintiff

Dated: December 1, 2020

/s/ Allison J. Cheung
ALLISON J. CHEUNG
Special Assistant United States Attorney